

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

	X	
	:	
SARAH EDMONDSON, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	1:20-cv-00485-EK-SMG
	:	
KEITH RANIERE, et al.,	:	
	:	
Defendants.	:	
	:	
	X	

STIPULATED ORDER STAYING PROCEEDINGS

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel in the above-captioned action that the case be stayed pending final adjudication in the trial court in *United States v. Ranieri*, 18-cr-00204 (NGG), in accordance with the following:

WHEREAS this action, commenced by the filing of a complaint on January 28, 2020, asserts claims, among others, under 18 U.S.C. § 1595(a), and

WHEREAS, 18 U.S.C. § 1595(b)(1) provides that “[a]ny civil action filed under subsection (a) shall be stayed during the pendency of any criminal action arising out of the same occurrence in which the claimant is a victim,” and

WHEREAS, 18 U.S.C. § 1595(b)(2) provides that a criminal action remains pending “until final adjudication in the trial court,” and

WHEREAS, the undersigned parties stipulate and agree that *United States v. Ranieri, et al.*, No. 18-cr-00204 (NGG), implicates and triggers the mandatory stay under 18 U.S.C. § 1595(b)(1), and

WHEREAS, the undersigned parties respectfully request the Court to endorse and enter this proposed stipulated Order (“Proposed Stipulated Order”):

1. This action is stayed in its entirety, and all deadlines and further proceedings shall be adjourned until the date “of final adjudication in the trial court” for all defendants in *United States v. Ranieri*. At such time, the stay in this action shall be lifted in accordance with Paragraph 2 below.

2. No later than one business day after the date of the final adjudication in the trial court for the last defendant in *United States v. Ranieri*, Plaintiffs shall file with this Court a Notice advising this Court and the Clerk of its occurrence. Absent further Order of this Court, upon the filing of Plaintiffs’ Notice of the final adjudication for the last defendant in *United States v. Ranieri*, the Clerk shall enter on the docket a notice advising the parties that this Stay Order has been lifted and resetting all deadlines.

3. Defendant Clare Bronfman has agreed to accept service through an agreement with Plaintiffs’ counsel reflected in this Stipulation. By this Stipulation and acceptance of service of a summons and complaint in this action, however, Defendant Clare Bronfman does not waive any defenses as to jurisdiction, venue, or any grounds other than defect in the summons or service of process.

4. As part of that agreement, Defendant Clare Bronfman is not required to file an answer or other response to the complaint under Fed. R. Civ. P. 12 and the Court’s Individual Practices and Rules (“Response”) until the stay has been lifted. Accordingly, the deadline to file a Response shall be twenty-one (21) days from the date on which the stay is lifted.

STIPULATED TO AND APPROVED BY

Dated: June 24, 2020

/s/ Craig C. Martin
Craig C. Martin
Sara Tonnies Horton
WILLKIE FARR & GALLAGHER LLP
300 North LaSalle Street
Chicago, IL 60654
Tel: (312) 728-9000
Fax: (312) 728-9199

Jeffrey B. Korn
WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, New York 10019-6099
Tel: (212) 728-8000
Fax: (212) 728-8111

Ronald S. Sullivan Jr.
712 H. Street NE, Suite 1354
Washington DC 20002
Tel: (202) 873-9120
Fax: (202) 863-1459

Counsel for Defendant Clare Bronfman

IT IS SO ORDERED

Dated: _____, 2020

/s/ Aitan D. Goelman
Neil L. Glazer
William E. Hoese
Steven M. Steingard
Stephen H. Schwartz
Craig W. Hillwig
Zahra R. Dean
Aarthi Manohar
KOHN, SWIFT & GRAF, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103
(215) 238-1700

Aitan D. Goelman
ZUCKERMAN SPAEDER
1800 M Street NW, Suite 1000
Washington, DC 20036
(202) 778-1800

Counsel for Plaintiffs

Hon. Eric R. Komitee
United States District Judge